

November 12, 1998

Re: Call-in Technical Inquiry 0400A – Floodplain Determination - Sault Ste. Marie

Dear NEPA User:

This letter is in further response to your September 10, 1998 request for a floodplain determination for GSA property located in your region. The property in question is part of Methodist Mission Reserve 0.62A and is bound by a legal description which you provided to us for use in obtaining the determination. A building is located on the property, but does not have a street address. In our previous response, we were not able to obtain a flood zone determination for the building in question due to lack of information about where the building is sited within the property boundaries. You sent us additional maps to help in making this determination, which we in turn forwarded to Flood Zone Determination Services (FZDS). We also ordered original copies of the applicable Flood Insurance Rate Map (FIRM) from the Federal Emergency Management Agency (FEMA).

### SUMMARY OF FINDINGS

NEPA Call-In was still unable to obtain an exact determination from FZDS for this particular property. However, we were able to make an approximate determination that the building in question is located in flood zone 'AE' based on scales of both the detailed survey map and the FIRM. Flood zone 'AE' represents the 100-year flood zone. An explanation of the steps taken to make this determination is located on the FIRM for the property in question (enclosed). We also contacted a representative of the U.S. Army Corps of Engineers (ACE) Floodplain Management Services Program (FPMS) to assist in this determination. NEPA Call-In's detailed findings are provided below.

### DETAILED FINDINGS

NEPA Call-In forwarded the detailed survey map of the area in question to FZDS, Carnegie, Pennsylvania, (800) 841-0662, and requested a second standard flood zone determination for the building on the property in question. FZDS was again unable to provide a determination with the explanation that the FIRM does not show detailed enough information and that the building in question is sited very close to, if not in, the 100-year flood zone. NEPA Call-In then received the appropriate FIRM from FEMA.

To make an approximate determination for the building using the detailed survey map provided by you and the FIRM we obtained for this area, NEPA Call-In first measured the distance between a reference point on the survey map provided by you and the side of the building closest to the 'AE' flood zone. Using the scale on the survey map, we determined the distance from an intersection of two roads to the building to be 425 ft. We then determined this distance in inches on the FIRM map using the scale provided, and measured this distance in inches on the FIRM map from the same intersection that was measured on the survey map. This distance, approximately 425 ft., resulted in the approximate location of the building being within flood zone 'AE'. NEPA Call-In cautions that this method of interpolation cannot provide an exact determination and that a detailed on-site survey of the building is the only way for a truly accurate determination of the building's location in relation to the floodplain. The procedure and calculations involved in making this determination are provided directly on the FIRM.

NEPA Call-In then contacted Mr. Joe Wanielista, FPMS Coordinator, ACE Detroit office, (313) 226-7095, to ask for ACE assistance in making a floodplain determination for the building in question. Mr. Wanielista stated the ACE is familiar with this area due to past dredging and other water management

activities in the area, and that there may be additional surveys or other historical data on file to assist. We then forwarded information pertaining to the site location, including site coordinates from the U.S. Geological Survey 7.5 minute topographic map, and the FIRM map for the area to Mr. Wanielista to use in searching ACE files for additional survey information. Mr. Wanielista then stated if he is unable to make a determination from information on file, the only method for an accurate determination would be to have an on-site survey performed. Mr. Wanielista further stated his office is willing to perform the on-site survey, but that he would have to charge the fee normally charged to other Federal agencies for such assistance under the FPMS program. NEPA Call-In will forward any additional information or determinations made by the ACE in a follow-up to this letter.

Regarding the use of commercial floodplain determination services for agency decisionmaking, the NEPA Liaison, GSA National Office, cautions that such services should not be relied upon as a sole source of information. The NEPA Liaison has stated that commercial floodplain determination services could be used to support other information obtained by you in consultation with the ACE, local city and State planning and permitting offices, and other appropriate agencies such as FEMA and Housing and Urban Development (HUD).

You should also be aware that Federal agencies must comply with the provisions of Executive Order (EO) 11988, "Floodplain Management," May 24, 1977. EO 11988 requires Federal agencies to avoid "to the extent possible the long and short term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct or indirect support of floodplain development wherever there is a practicable alternative." The EO discusses development in relation to the 100-year floodplain (500-year floodplain for critical actions), but does not provide waivers for development in floodplains with minimal flood depth. Furthermore, property protected from 100-year floods by levees does not necessarily indicate the property is removed from the 100-year floodplain for the purposes of compliance with EO 11988. According to EO 11988, if your action is determined to be a critical action, it should not be located in property designated as Zone X with shading unless this is the only practicable alternative (see NEPA Call-In Factsheet, "When Siting in the Floodplain is the only Practicable Alternative").

The materials in this TI have been prepared for use by GSA employees and contractors and are made available at this site only to permit the general public to learn more about NEPA. The information is not intended to constitute legal advice or substitute for obtaining legal advice from an attorney licensed in your state and may or may not reflect the most current legal developments. Readers should also be aware that this response is based upon laws, regulations, and policies in place at the time it was prepared and that this response will not be updated to reflect changes to those laws, regulations and policies.

Sincerely,

(Original Signed)

NEPA Call-In Researcher